

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA
LLC, F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

SECOND DECLARATION OF LEITA WALKER

I, Mary Andreleita (“Leita”) Walker, under penalty of perjury and subject to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at Ballard Spahr LLP in Minneapolis, Minnesota, and lead counsel for Defendant Netflix, Inc., in the above-referenced matter. I have personal knowledge of the matters set forth herein, and I make this declaration in support of Netflix’s Opposition to Plaintiff’s Motion for Partial Summary Judgment.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the transcript of the deposition of Plaintiff Andrew Colborn in this matter.

3. Attached hereto as **Exhibit 2** is a complete version of the Appendix to Defendant Netflix, Inc.’s Opposition to Plaintiff’s Motion for Partial Summary Judgment, which includes a column listing verbatim each of the 52 “statements” or “embellishments” that Colborn puts in issue as part of his MPSJ.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2022

/s/Leita Walker
Leita Walker